

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

POST OFFICE STRUCTURE PLAN

DOCKET NO. N2012-2

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 5]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

May 30, 2012

Respectfully submitted,

N20122A1

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-1 The Postal Service has filed a number of Library References in this Docket that contain large listings of various postal facilities in the format of an Excel spreadsheet. USPS-LR-N2012-2/1 has one spreadsheet and USPS-LR-N2012-2/2 has two spreadsheets.

[a] For each of these three spreadsheets please generically describe the type or categories of postal facilities that are included in the listing along with the approximate number of facilities in that listing.

[b] For each of these three spreadsheets please generically describe the type or categories of postal facilities that are NOT included in the listing along with the approximate number of facilities that are not included in that listing.

[c] For each of these three spreadsheets please fully describe each of the column headings and if there is a code shown the listing of the difference entries in that column.

DBP/USPS-2 [a] As the process is being implemented, how will members of the public be able to determine those offices that have become an RMPO and what the APO is for that facility?

[b] Will this information be shown on the usps.com website?

[c] If not, why not?

DBP/USPS-3 [a] Is the PTPO determined by a 25-mile driving distance or by an airline distance?

[b] Please provide any guidelines that are provided to evaluate or determine that distance.

DBP/USPS-4 Regarding the market research that was conducted in which customers had to choose between five options, please discuss and provide any insight as to why a customer would choose Option 1. For example, if Office A was going to be closed and Office B was a nearby office that would remain open, why would 15% of the survey respondents believe that it was better to have only Office B open rather than having BOTH offices A and B open?

DBP/USPS-5 [a] Regarding the market research that was conducted, options 2 and 3 provide for a different category of postal facility. Please provide a complete listing of the services that would be available in the type of facility contemplated in Option 2, in Option 3, and in an independent post office?

[b] Was this data provided to the survey participants?

[c] If not, why not?